#### <u>REMARKS</u>

Claims 1-19 remain pending in this application. Claims 1, 10, and 16 have been amended.

In the Office Action mailed April 5, 2004, the Examiner objected to the drawings because Figures 1, 2, 3A, and 3B should be designated by a legend such as "Prior Art." Applicants are submitting herewith substitute formal drawings for Figures 1, 2, 3A, and 3B wherein the legend "Prior Art" has been inserted. Approval and entry of these drawings is respectfully requested.

Claims 1-19 were rejected under 35 U.S.C. § 112, first paragraph, as failing to comply with the enablement requirement. Claims 1, 7, 8, 10, and 11 were rejected under 35 U.S.C. § 102(e) as anticipated by U.S. Patent No. 5,298,988 ("Tsujihara et al."). Claims 2-6, 9, and 12-19 were rejected under 35 U.S.C. § 103(a) as unpatentable over Tsujihara et al. in view of U.S. Patent No. 5,694,181 ("Oh").

Applicants respectfully disagree with the bases for the rejections and request reconsideration and further examination of the claims.

# Section 112 Rejection

In remarks accompanying this rejection, the Examiner states that the claimed control signal having "an amplitude of which varies along each line according to a first curve of a first type" is not enabled because Figure 4A shows a straight line P1 having a constant level and hence is "not a curve but a line."

It appears the Examiner is misreading the claim language. The recited "first curve of a first type" is not the first curve of Figure 4A as referenced by the Examiner. Rather, the "first curve" is depicted in Figure 4D, which is a combination of the line parameters of Figures 4A, 4B and 4C. This is clearly described in the specification at page 8, line 20 through page 9, line 8.

Looking at it another way, the first line parameter set forth in Figure 4A is a constant DC voltage or "DC offset" as understood in the art. Although applicants have used the word "curve" in the specification with respect to Figure 4A, it is used in its meaning of a

"set of the different positions of a point whose motion follows a predetermined law." The word "curve" is not used in the specification to exclude straight lines.

## **Discussion of References**

The foregoing explanation should assist the Examiner in understanding the difference between the claimed invention and the references cited by the Examiner, especially Tsujihara et al.

Applicants note that the Examiner references U.S. Patent No. 5,298,988, which is not Tsujihara et al. Rather, applicants have confirmed in a telephone call with the Examiner that the reference is U.S. Patent No. 5,298,985, which is the Tsujihara et al. reference that accompanied the first Office Action.

As previously explained in the response to the first Office Action, Tsujihara et al., U.S. Patent No. 5,298,985, is directed to a control method for an image correction apparatus in which display areas are "being varied." As Tsujihara et al. teach at column 6, lines 28-69, the correction of horizontal deflection amplitude via the horizontal convergence coil for a screen having an aspect ratio of 16:9 will not work when the aspect ratio or display area of the screen is changed to 1:1. As Tsujihara et al. explains at column 6, lines 59-61, "The spatial correction value on the screen is so large that there arise changes in the conversions, focus and luminance."

Hence, the original correction waveform of amplitude V1 shown in Figure 7B must be reduced to amplitude V2, shown in Figures 7B-7C, in order to accommodate the smaller screen display area having the aspect ratio of 1:1. Nowhere does Tsujihara et al. teach or suggest varying the amplitude from V1 to V2 on a line-by-line basis. Rather, the amplitude of the correction waveform remains the same for each screen line. The amplitude changes not screen line by screen line but only in response to a change in the aspect ratio the size of the display area of the screen. Moreover, Figure 7B clearly shows how the value V2 is determined: The value V2 is equal to the value given to the correction waveform when, on a screen with a 16:9 aspect ratio, the spot of the screen is in the position corresponding to the end of a line for a screen with a 1:1 aspect ratio. V1 and V2

are two values of the same variable (the amplitude of the correction waveform), and the variable is changed only when the aspect ratio of the screen changes.

In remarks accompanying the rejection, the Examiner states that "The amplitudes of V1 and V2 varies along an imaginary straight line which can be determined by drawing a plurality of the lines to obtain a given parameter for each line, each of the plurality of the line parameters inherently varies from line to line as one follows the curve up or down." In light of applicants' foregoing explanation of the teaching of Tsujihara et al., one would understand that a variation from V1 to V2 of the amplitude of the horizontal deflection along an imaginary straight line, which can be determined by drawing a plurality of lines, would only be of some use if the aspect ratio of the screen changed from line to line. Tsujihara et al. do not teach or suggest such a "line-to-line" variation of a parameter as set forth in claim 1.

## **Discussion of Claims**

Claims 1, 10, and 16 have each been amended to recite the first curve of a first type determined by a plurality of lines parameters, each of the plurality of line parameters generated to vary from screen line to screen line according to a second curve of the first type determined by a plurality of column parameters. In other words, each of the independent claims recite the line parameters varying from screen line to screen line, thus clearly distinguishing the present invention over the teaching of Tsujihara et al. Claim 7, which is directed to a device for adjusting the convergence of three parallel electron beams utilizes a control signal generated as set forth in claim 1. In view of the discussion above with respect to Tsujihara et al., applicants respectfully submit that claims 1, 7, 8, 10, and 11 are clearly allowable over Tsujihara et al. because this reference fails to teach a control signal generated by a plurality of line parameters that vary from screen line to screen line according to a second curve that is determined by a plurality of column parameters.

The remaining claims, *i.e.*, claims 2-6, 9, and 12-19 are not obvious over the combination of Tsujihara et al. and Oh for the reasons discussed above with respect to Tsujihara et al. Any combination of these two references would fall short of the claimed combination because nowhere do Tsujihara et al. and Oh, taken alone or in any

combination thereof teach or suggest generating a control signal that has an amplitude which varies along each screen line according to a first curve of a first type determined by a plurality of line parameters that vary from screen line to screen line according to a second curve determined by a plurality of column parameters.

#### Request for Interview

In the event the Examiner disagrees with the foregoing, applicants respectfully request a telephonic interview between applicants' undersigned representative and the Examiner in this case in order to expeditiously resolve any questions or issues the Examiner may have regarding the Tsujihara et al. reference and its inapplicability to the claimed invention as set forth in claims 1-19. Thus, in the event the Examiner disagrees with the foregoing or sees minor informalities that can be resolved by telephone conference. the Examiner is urged to contact applicants' undersigned representative by telephone at (206) 622-4900 in order to expeditiously resolve prosecution of this application.

Consequently, early and favorable action allowing these claims and passing this case to issuance is respectfully solicited.

The Director is authorized to charge any additional fees due by way of this Amendment, or credit any overpayment, to our Deposit Account No. 19-1090.

Respectfully submitted,

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ERT:alb

**Enclosures:** 

Postcard

2 Sheets of Replacement Drawings (Figures. 1, 2, 3A, and 3B)

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